

April 18, 2022

Mr. James Smith  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

Re: Docket No. 70-925; License No. SNM-928  
Cimarron Environmental Response Trust  
License Condition 27(e) Annual Report for 2021

Dear Sirs:

License No. SNM-928, Amendment 21, Condition 27(e) authorizes the licensee to make certain changes to the NRC-approved Decommissioning Plan (D-Plan) and Radiation Protection Plan (RPP) without NRC's approval, if these changes are consistent with the ALARA principle and decommissioning process. While there were no tests or experiments conducted in 2021, the RPP was revised and approved by the ALARA Committee. No changes to the NRC-approved D-Plan were made in calendar year 2021 although a draft D-Plan was informally submitted to the NRC.

Revision 4 to the RPP was approved by the ALARA Committee and issued on March 1, 2021. In its review of the changes incorporated into Revision 4, the ALARA Committee:

- Approved changes that did not conflict with license requirements and did not impair the licensee's ability to meet all applicable NRC regulations;
- Ensured the changes did not degrade safety or environmental commitments in the NRC-approved D-Plan or RPP or did not have a significant adverse effect on the quality of work, the remediation objectives or health and safety; and
- Ensured the revised RPP remained consistent with the conclusions of actions analyzed in the Environmental Assessment (dated July 29, 1999) and Safety Evaluation Report (dated August 20, 1999).

To support submittal to the NRC of Revision 2 to the D-Plan, a draft version of Revision 4 to the RPP was developed to ensure the RPP included appropriate provisions to support implementation of the D-Plan. These changes were incorporated in Revision 4 with some modifications noted in the following bullets.

- Supplemental information that was identified during NRC staff acceptance review of draft Revision 4 to the RPP was incorporated into the approved version of Revision 4 of the RPP.
- Further changes were incorporated to ensure consistency with Revision 2 of the D-Plan.
- Changes driven by internally identified deficiencies or opportunities for improvement were incorporated.
- Changes influenced by the 2020 NRC inspection findings.
- Changes identified during the annual ALARA Committee review of the RPP.

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Proposed provisions that are directly related to supporting implementation of the groundwater processing scheme contained in Revision 2 of the D-Plan require NRC approval and cannot be implemented at this time. Consistent with the ALARA Committee decision to include these proposed provisions in Revision 4 of the RPP, these changes are shown in **GRAY HIGHLIGHTED TEXT**. Additional changes are expected from NRC review of Revision 4 to the RPP, which will be incorporated into Revision 5.

Attachment 1 to this letter is a copy of the ALARA Committee evaluation of changes contained in RPP Revision 4. Attachment 2 to this letter is RPP, Revision 4.

This report is being submitted only in electronic format. Hard copies will be provided upon request. If you have any questions or desire clarification, please call me at (405) 641-5152.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeff Lux".

Jeff Lux, P.E.  
Project Manager

cc: Robert Evans, NRC Region IV  
vcpsubmittals@deq.ok.gov  
NRC Public Document Room

Attachments:

- (1) 27(e) Evaluation for Radiation Protection Plan Rev 3.2
- (2) Cimarron Radiation Protection Plan, Revision 4

ATTACHMENT 1  
27(e) EVALUATION FOR RADIATION PROTECTION PLAN REV 4

ATTACHMENT 2  
CIMARRON RADIATION PROTECTION PLAN, REVISION 4